Chang et al v. Virgin Mobile USA LLC et al Doc. 29 Att. 1

UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF TEXAS
DALLAS DIVISION

SUSAN CHANG, as Next Friend of Alison Chang, a minor, And Justin Ho-Wee Wong	§	
	§	
Plaintiffs,	§	CAUSE NO. 3:07-CV-01767
v.	§	
	§	
Virgin Mobile Pty Ltd.,	§	
Defendant.	§	

AFFIDAVIT OF RYAN H. ZEHL IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION TO RESPOND TO DEFENDANT'S MOTION TO DISMISS

STATE OF TEXAS §
§
COUNTY OF DALLAS §

Before me, the undersigned Notary Public, on this day personally appeared Ryan H. Zehl, a person known to me who, first being duly sworn on oath, deposed and stated:

1. My name is Ryan H. Zehl. I am over twenty-one (21) years of age. I am of sound mind and have never been convicted of a felony or a crime involving moral turpitude. I am fully competent to testify to the matters set forth herein. The factual matters set forth herein are within my personal knowledge and are true and correct.

2. Plaintiffs retained my services to pursue their claims against Virgin Mobile Pty Ltd. A 90 day extension on Plaintiffs' motion to respond to Defendant's Motion to Dismiss is necessary so that Plaintiffs can obtain the information and evidence

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needed to establish that the assertion of personal jurisdiction over Defendant is proper and in accordance with both established precedent and the Due Process Clause of the United States Constitution.

3. Both my clients and opposing counsel have consented to our requested extension.

FURTHER AFFIANT SAYETH NOT.

RYAN H. ZEHL
Affiant

SWORN TO AND SUBSCRIBED BEFORE ME on this 2 day of January 2008.

PATSY JAESCHKE
Notary Public, State of Texas
Commission Expires 02-10-2010

Notary Public, State of Texas